

EPA Region 7 Desk Statement
October 3, 2014

EPA Region 7 is committed to ensuring the public is protected from the radioactive contaminants at the West Lake Landfill Superfund Site. EPA bases its decisions on valid, scientific data, which this agency shares with the community. Based on the body of evidence available EPA Region 7 has concluded that the conditions at the site are protective of human health and this agency will continue working toward a final remedy to ensure that the site remains that way.

EPA Region 7 is leading a comprehensive multi-agency effort to establish a final remedy for the site while supporting the Missouri Department of Natural Resources' and Missouri Attorney General's work to protect public health from the subsurface smoldering event in the adjacent Bridgeton Landfill. The agency continues directing the potentially responsible parties to collect necessary data needed to evaluate alternatives for the selection of a final remedy.

EPA Region 7 announced a decision on the final remedy in 2008. However, community concerns persuaded this agency in January 2010 to reevaluate the ROD remedy and excavation alternatives. The Final Supplemental Feasibility Study for Operable Unit 1, dated December 2011, presented the results of this re-evaluation and is available on EPA Region 7's website. Additional quarterly groundwater sampling was performed by the PRPs at EPA's direction in 2012 and 2013, and the four quarterly reports on these sampling events (Groundwater Monitoring Reports, Additional Groundwater Sampling Event, Operable Unit 1, dated December 2012, July 2013, December 2013 and February 2014) are also available on EPA Region 7's website. In addition, EPA and the US Geological Survey sampled several privately-owned wells to the northwest and southwest of the site in 2013 and found no radionuclides exceeding drinking water standards in any of these wells. Work is currently underway by the responsible parties to amend the Supplemental Feasibility Study to address recommendations for additional studies from EPA's National Remedy Review Board. Once those additional studies are completed, this agency can move to the next step in the process, share a proposed plan for final remedy and make the final remedy selection.

In the meantime EPA has established an air monitoring system in the offsite areas surrounding the West Lake Landfill Site. This system includes five air monitoring stations that collect data for gamma radiation; radon; alpha-, beta- and gamma-emitting radionuclides; volatile organic compounds; and landfill gases. None of the data collected thus far has indicated the presence in the surrounding residential and industrial properties of any contaminants above established health based limits. In 2013, EPA used its ASPECT airplane to survey the surface soil at the site and the surrounding residential and industrial properties for gamma radiation that would indicate soil contamination by radionuclides. This survey found one small area of excess gamma emissions in one of the known radiologically-contaminated areas of the site (Operable Unit 1, Area 2) but found no excess gamma emissions anywhere else on site, and found no excess gamma emissions at any off-site locations. The report of this work, "Radiological and Infrared Survey of the West Lake Landfill, Airborne Spectral Photometric Environmental Collection Technology (ASPECT), May 2013" is available on EPA Region 7's website.

With regard to the subsurface smoldering event (SSE), EPA's Office of Research and Development has evaluated potential SSE effects in its "Observations on the EMSI Report: Evaluation of Possible Impacts of a Potential Subsurface Smoldering Event on the Record of Decision – Selected Remedy for Operable Unit 1 at the West Lake Landfill, March 28, 2014" which is available on EPA Region 7's website. EPA has also reviewed the August 29, 2014 Memorandum from Todd Thalhammer, PE, and EPA does not believe that the data collected thus far substantiates a conclusion that the SSE is moving toward the

RIM. EPA is continuing to collaborate with the Missouri Department of Natural Resources and the Attorney General's Office on the collection of additional information about and the monitoring of the SSE. MDNR, as the lead regulatory agency for responding to the SSE, maintains a comprehensive history of the SSE on its webpage at <http://dnr.mo.gov/env/swmp/facilities/BridgetonSanitaryLandfill-Background.htm>, and posts regular reports of analytical data for air samples, landfill subsidence, and the extent of the SSE on its webpage at <http://www.dnr.mo.gov/bridgeton/index.html>.

In response to the concerns expressed by the community, the St. Louis County Office of Emergency Management prepared a precautionary Emergency Operations Plan for the Westlake Landfill (Shelter in Place/Evacuation Plan). EPA has assisted and will continue to assist the county and other emergency responders on emergency planning and believes it is prudent to do so. However, developing such plans does not indicate that the community is in danger or the risk level is high.

On September 22, 2014, the Missouri Department of Health and Senior Services released an "Analysis of cancer incidence data in eight ZIP code areas around Coldwater Creek, 1996-2011". This document summarized the incidence of various types of cancers in the area but did not attempt to identify the causes of these cancers. In particular, MDHSS noted in its report that "the exact cause of brain cancer is unknown" and that existing research has not linked brain cancer in children to radiation exposure except for those treated with ionizing radiation to the brain or head. These unknowns require additional research, so MDHSS has requested the involvement of the Agency for Toxic Substances and Disease Registry and the Centers for Disease Control. EPA appreciates the work of MDHSS in producing this report, and will continue to support them and other partners as this agency works to protect human health and the environment in and around St. Louis.

In summary, EPA Region 7's evaluations of the recently released information along with the historical record indicate there is no off-site exposure to the radioactive material at the West Lake Landfill. EPA will mandate that any work at the site for an isolation barrier and the final remedy will be done in a manner as to be protective of those living and working in the areas close to the landfill.